

MEMORANDUM

DATE: August 22, 2014

TO: Rose Longoria, Yakama Nation Fisheries

FROM: Bob Dexter, Ridolfi Inc.

SUBJECT: Additional comments on Draft Introduction to the Portland Harbor Feasibility Study

We appreciate EPA's efforts to address many of the comments on Section 1 that we provided previously, but feel that overall the section could be improved as an introduction to the FS. At this point, we suggest including a summary section that could provide a reasonable link between the results of the RI and the information in the FS, particularly for readers less familiar with the RI document. This summary should focus on the following points:

- The RI identified, quantified, and located contamination in the river.
- The risk assessments determined that a number of these contaminants in all media pose risks to humans and natural resources.
- The risks are primarily associated with a few chemicals.
- The most feasible and effective way to eliminate or reduce those risks is by cleaning up the sediments.
- The FS focusses on the sediment cleanup, but also considers the effectiveness in reducing risks in other media.
- The FS focusses on the cleanup of the primary risk chemicals, but will evaluate the effectiveness of the remedies on all chemicals of concern.

With regard to LWGs comments noted in the latest draft of Section 1, we do not have the resources to address each one, but they may be considered under a few broad categories, as addressed below.

- Some of LWG's comments are simple editorial notes or suggestions that citations be added for statements in the text. An additional number of their comments identify apparent differences in the information presented in the RI and Section 1 of the FS. We feel that these discrepancies should be addressed.
- A greater number of LWG's comments address what they consider to be incomplete and unbalanced summaries of the RI. These comments are, in general, consistent with concerns we noted in our previous comments (YN memo dated June 20, 2014). For example we agree that the presentation of sources and source control efforts, as well as the discussion of groundwater, overshadow and divert the reader's attention from the in-river contamination, the focus of the FS.

- The final group of LWG comments address disagreements between LWG and EPA regarding information/data interpretation or usage. These comments are numerous and often complex so they were beyond what we could review in detail, but we did not identified any of those issues with which we agree with LWG.

Finally, we continue to request that the Yakama Nation, and the other stakeholders, be recognized as contributors to the RI/FS process along with the mention of Oregon DEQ.